| Draft EPA review comments, Version 1, dated 10/13/2017 | | |
|--|-------------|--|
| | Trench Unit | |
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| | TU067 | |
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| | TU068 | |
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USEPA Review of draft Radiological Data Evaluation Findings Report for Parcels G Soil Trench

Units

| Overall score (0, 1, or 2) | Box Plots | Q-Q Plots | Rounds of excavatio n |
|----------------------------------|--|--|--------------------------------|
| 1 | RAS results for all rads do not have any variability and are from a different population than all other surveys/samples so they look suspicious. K-40 FSS results very low variability, low concentrations, and indicate a different population | K-40 in FSS possibly from a different popultaion | 3 |
| 1 | FSS results have very low variability compared to other surveys, especially for K-40, DG K-40 variability changes bewtween sampling events | K-40 in FSS possibly from a different popultaion | 3 |

| | Gamma scan or static concerns |
|---|--|
| | |
| | L - Sampler name, off-site sample mass and COC forms for samples missing from reports. 2 -Static survey not signed by RSO in SUPR 3 - Raw scan data not in SUPR - Scan and static data do not appear to be consistent: scan data highest result was 4,843 cpm; static data ranged from 2,530-6,240 cpm Scan data appears to fall within the expected variability (2.608 - 7,560 cpm) |
| 1 | L - Sampler name, off-site sample mass and COC forms for samples missing from reports. |
| | 2 -Static survey not signed by RSO in SUPR |
| | 3 - Raw scan data not in SUPR |
| | Scan data appears to fall within the expected variability (2,608 - 7,560 cpm) |

| On vs offsite lab | Time Series | Suspect name (1=yes, 0=no) | Name, if suspect |
|---|-------------|-------------------------------|------------------|
| According to Data Eval Plan, the onsite vs off-site data are consistent | | 1 | R Roberson |
| According to Data Eval Plan, the onsistent | | 0 | |

| Name, if not suspect | Signs of falsifying (1=Yes, 0=no) | Signs of falsification summary | Failure to follow workplan (1=Y, 0=N) |
|----------------------|--|--|---|
| | 1 | 1 -RAS results look suspicious due to very low variability 2 - Review form indicates allegations associated with this TU: Former Worker Allegation: RSY-2 laborers missing the required number of samples. Taylor told them to go get a sample "from anywhere." They went behind the Conex to another pad and got an unrelated "false" sample. Allen and Reggie 3 - missing COCs and raw scan data in reports | |
| P Vigil | 1 | 1 -RAS results look faked due to very low variability 2 - SUPRs missing COCs, RSO signatures, sampler names, and raw scan data in reports 3 - Multiple excavations, adjacent to TU067 where worker allegations specify excavated soil was not scanned properly in RSY2 4- Population of K-40 on is much more variable on 9/19/07 than the remaining 10 events. From 9/19/07 to 9/20/07 variability drops. | |

| Signs of failure to follow workplan | | |
|--|--|--|
| Missing data and info in SUPRs | | |
| | | |

Comments - Other

This survey unit is suspect for the following reasons:

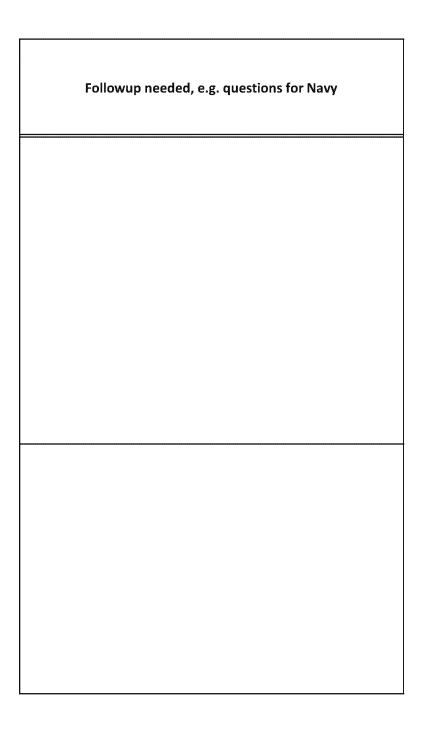
- 1 Former worker allegations regarding screening of soil from this trench unit at the RSY2. This indicates a high potential that FSS results could also have been falsified
 - 2 RAS results do not have normal variability suspect for falsification
 - 3 K-40 FSS results look like they are from a different popultaion than other surveys
 - 4 COCs and names of samplers missing in SUPR
 - 5 No RSO signatures on survey results
 - 6 Raw scan data missing from SUPR

Recommend for re-sampling

This survey unit is suspect for the following reasons:

- 1 Variability in sample results for FSS low suspect for falsification
- 2 K-40 FSS results look like they are from a different population than other surveys
 - 3 COCs and names of samplers missing in SUPR
 - 4 No RSO signatures on survey results
 - 5 Raw scan data missing from SUPR

Recommend for re-sampling



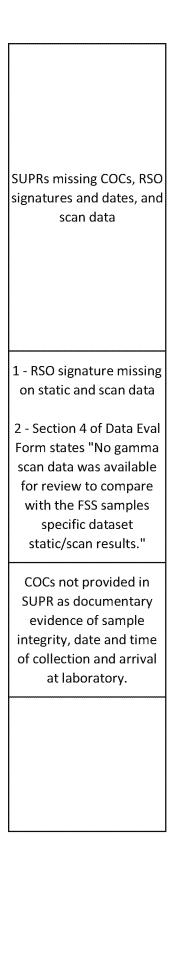
| TU069 |
|-------|
| TU071 |
| TU072 |
| TU073 |

| 2 | RAS results for all radionuclides have low variability and for Ac-228 and Bi-214, indicate RAS results are from a different population than all other surveys/samples. K-40 FSS results have very low variability, low concentrations, and indicate ther are different populations among the surveys, DG K-40 variability changes bewtween sampling events | K-40 in FSS from a different popultaion | 3 |
|---|---|--|---|
| 2 | RAS samples show different population for Bi-214 K-40 FSS-Bias have a large variability indicating either heterogeneous soil or potentially different soil populations | RAS K-40 results look different than other two surveys, however only two RAS samples were collected. K-40 FSS-Bias has a wider range of values. | 1 |
| 2 | No anomalies noted | No anomalies | 3 |
| 2 | No anomalies noted | No anomalies noted, K-40 slope slightly different in SYS_1 but this is due to one or more low results in this set of data. | 3 |

1 - Sampler name, off-site sample mass and COC forms for samples missing from reports. 2 -Static survey not signed by RSO in SUPR 3 - Raw scan data not in SUPR 4 - Scan and static data inconsistent: highest count for statics was 4,676 cpm; scan data ranged from 3,220 - 6,200 cpm Gamma static survey data highest count was 6,165 cpm; scan survey data ranged from 4,000 - 7,500 cpm. No range was provided for the Static survey data. No signature and date from RSO recorded on the Static Data Scan survey data not available for review, and no signature or date is recorded from the RSO. The Data Eval Form states the static data (highest count was 4,279 cpm) are inconsistent with the scan results (3,890-6,720 cpm) COCs not provided in SUPR Scan data (highest count was 4,673 cpm) and Static data (4,240 - 8,750) are not consistent. RSO signature and date missing from survey data, sampler not identified in SUPR

| According to Data Eval Plan, the onsite vs off-site data are consistent | Sys-1 and FSS-Bias results for K-40 are from a different population than the RAS of FSS. This indicates there may be different populations of soils/samples represented between the different surveys. | 1 | A Jahr |
|---|--|---|------------|
| According to Data Eval Plan, the onsite vs off-site data are consistent | Cs-137 results were mostly non- detect or negative. Cs-137 results should not be mostly negative. This indicates a potential data quality issue. | 0 | |
| According to Data Eval Plan, the onsite vs off-site data are consistent | No trends idenitified | 1 | R Roberson |
| According to Data Eval Plan, the onsite vs off-site data are consistent | No trends identified. | 0 | |

| | | | · |
|---------|---|---|---|
| | | 1 -RAS results for all radionuclides have low variability. 2 - Ac-228 and Bi-214 RAS results are from a different population than all other | |
| | | surveys/samples 3 - SUPRs missing COCs, RSO signatures, sampler names, and raw scan data in reports | |
| | 1 | 4 - Multiple excavations, near to TU067 where worker allegations specify excavated soil was not scanned properly in RSY2, DG K-40 more variable on 9/19/07 and 10/17/07 then other sampling events. | 1 |
| | | 5 - Worker involved in allegations included in sample team | |
| | | 6 - K-40 more variable on 9/19/07 and 10/17/07 than other sampling events. | |
| P Vigil | 1 | 1 - Scan survey data not available for review 2 - Static data range not provided in Data Eval Form. 3 - No RSO signature and date provided for static or scan data | 1 |
| | 1 | 1 - Inconsistent scan and static data; highest count for static survey was 4,279 cpm where scans ranged from 3,890 - 6,720 cpm2 - SUPR missing COCs 2 - Worker involved in allegations included in sample team | 1 |
| | | 1 - Scan and Static data inconsistency; narrow range of static data values which is not consistent with environmental monitoring. | |
| P Vigil | 1 | 2 - RSO signature on scan and static data results is missing | 0 |
| | | 3 - Suspect worker involved with data collection | |



This survey unit is suspect for the following reasons:

- 1 RAS results do not have normal variability and are from different popultaiton than other surveys for Ac-228 and Bi-214 suspect for falsification
 - 2 K-40 FSS results look like they are from a different popultaion than other surveys
 - 3 COCs and names of samplers missing in SUPR
 - 4 No RSO signatures on survey results
 - 5 Raw scan data missing from SUPR
 - 6 Worker involved in allegations performed work at this TU

Recommend for re-sampling

- 1 Remediation was performed due to Cs-137, the time series plots show that most of the characterization results for Cs-137 were at or near zero, or were negative values. This indicates a data quality issue, and thus, un-reliable data.
 - 2 Gamma scan data missing, and no RSO signature and date on static and scan data.

Recommend resample to confirm ROC concentrations for Ra-226 and Cs-137

- 1 Scan and Static data are inconsistent
- 2 SUPRs do not contain COCs for samples collected. Without this documentary evidence, the integrity, location, date, time or evidence of who had custody of the samples is missing. Therefore, the data is not defensible and not usable for decision making.

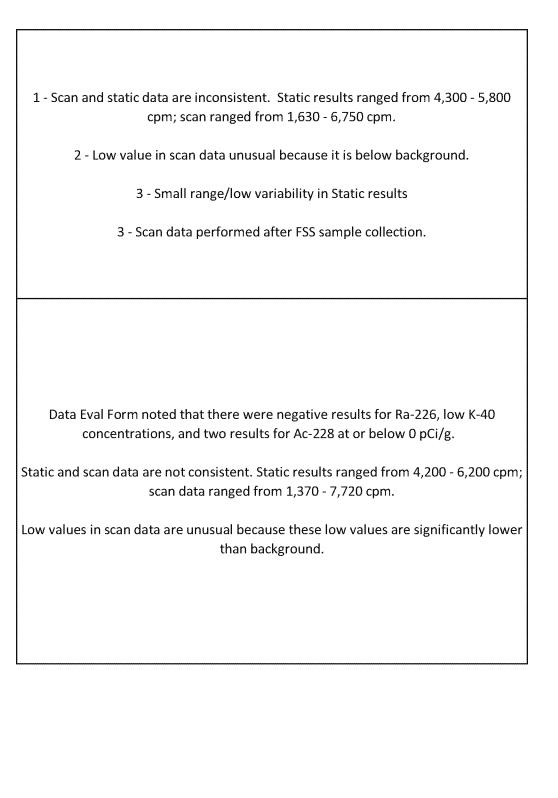
Recommend resample to confirm ROC concentrations

- 1 TU is downstream from Building 274 used for decontamination training and offices, Building 322 used by NRDL for development of radiation detection instrumentation (no contamination found and building demolished), and Buildings 313, 313A used by NRDL for Instrumentation laboratory and as stockroom and storage areas.
 - 2 -Cs-137 was found above the action level in 2002; but no evidence of residual radioactivity above the release criteria was found in 2014.

| Section 4 of Data Eval Form states "No gamma scan data was available for review to compare with the FSS samples specific dataset static/scan results." |
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| Need explanation on what this means. |
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| TU074 |
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| TU075 |

| 2 | No comparisons made - only one set of FSS data collected. Data are highly variable | No comparisions made - only one set of FSS data collected | 0 |
|---|--|---|---|
| 2 | Each event for each ROC has different variability with varying means. RAS and Bias results are slightly higher when compared to SYS-1 or FSS results for Ac-228 and Bi-214; however the number of RAS and FSS-Bias results is small and the differences in concentration ranges are relatively small | RAS and FSS-Bias K-40 data have a different slope than SYS-1 or FSS data sets, however range of values for RAS and FSS-Bias is only slightly different and number of samples is small | 2 |



| According to Data Eval Plan, the onsite vs off-site data are consistent | It is noted that extremely low results for Ac-228, Bi-214, and K-40 reported on the same days, indicating a potential problem with the data on these dates. Time series plots dates were not legible | 0 | |
|---|---|---|--|
| According to Data Eval Plan, the onsite vs off-site data are consistent | Ac-228 and Bi-214 RAS and Bias results are from a different population than SYS-1 or FSS results | 0 | |

| P Vigil | 1 | 1 - Scan and static data are inconsistent. Static results ranged from 4,300 - 5,800 cpm; scan ranged from 1,630 - 6,750 cpm. 2 - Low values in scan data unusual because the low counts per minute are within a range that is below background. 3 - Scan data performed after FSS sample collection. | 1 |
|---------|---|--|---|
| P Vigil | 1 | Inconsistent static data (4,200 - 6,200 cpm) and scan data (1,370 - 7,720 cpm), scan data includes results below background levels. Suspect worker involved in data collection. Each event for each ROC has different variability with varying means. | 1 |

Scan data collected after FSS sample collection which is a departure from the Work Plan.

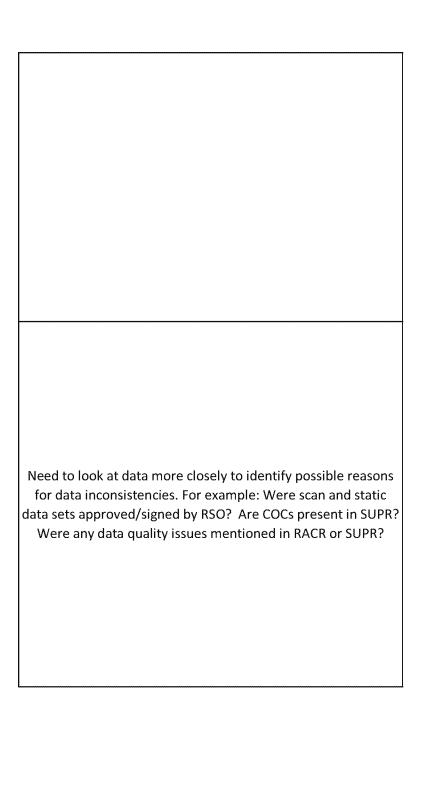
Section 4 of the Data Eval Form states that there was no mention of pipe swipe surveys or sediment sampling in manholes. This would indicate a deficiency in the investigation and a departure from the Work Plan.

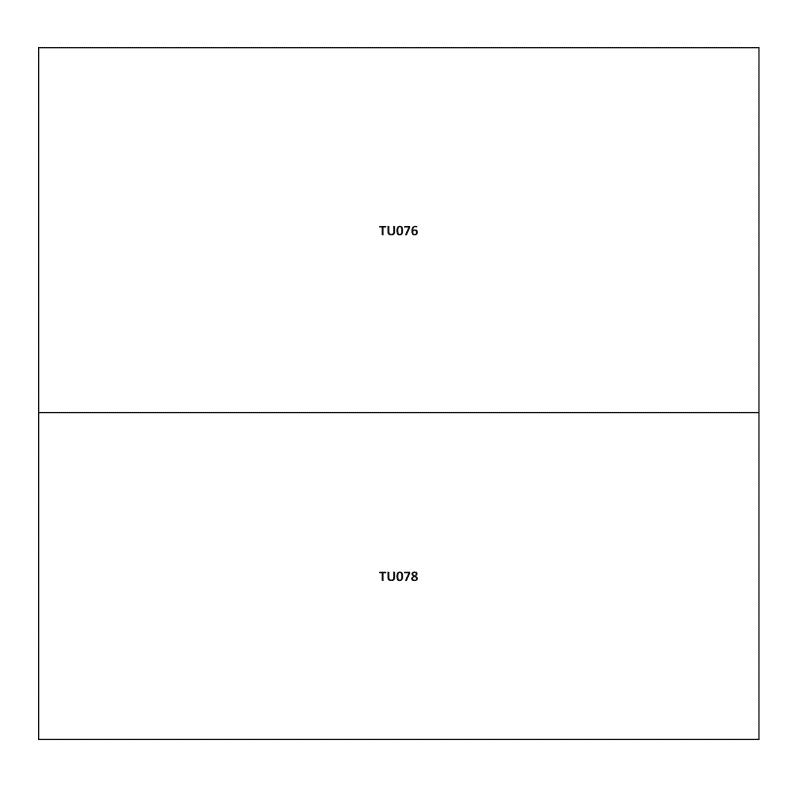
- 1 TU074 was not remediated but is adjacent to TUs 81 and 83 which did have contamination.
- 2 Sanitary sewer is associated with Bldg 401, used for storage of sealed sources, a maintenance shopt, and offices, a trades shop, and general store. No contamination is expected to have been released from this building; however, TU075 which was also connected to Bldg. 401 did have contamination.
 - 3 Scan and Static data are inconsistent, with unusually low results in scan data and in FSS data.
 - 4 Scan was performed after FSS samples collected.
- 5 Sampler not identified in SUPR, person responsible for gamma scans and static measurements is listed on the NRC petition as a suspect worker.

Recommend for re-sample

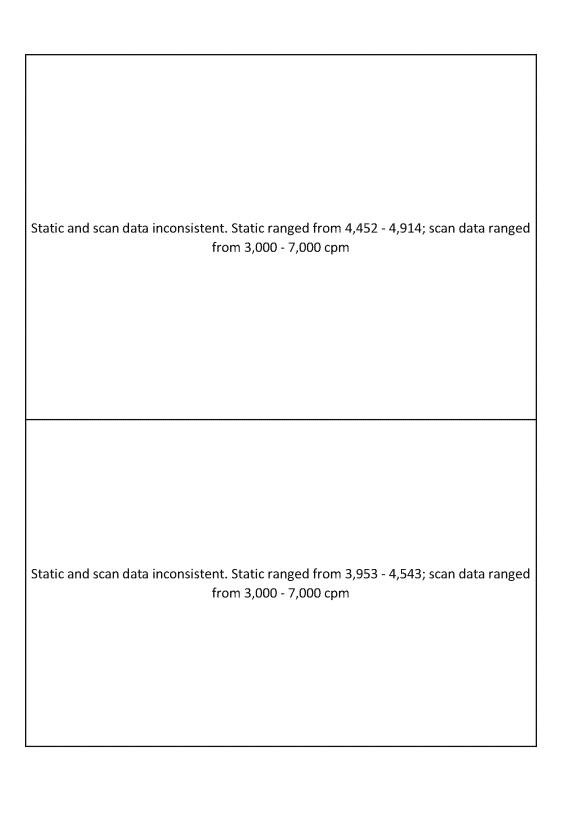
- 1 Data Eval Form noted that there were negative results for Ra-226, low K-40 concentrations, and two results for Ac-228 at or below 0 pCi/g. Reviewer comment: this could indicate poor data quality and/or falsification.
 - 2 Static and scan data are inconsistent. Static results ranged from 4,200 6,200 cpm; scan data ranged from 1,370 7,720 cpm: Low values in scan data are unusual because these low values are significantly lower than background.
 - 4 Sanitary sewer is associated with Bldg 401, used for storage of sealed sources, a maintenance shopt, and offices, a trades shop, and general store. The narrative states that no contamination was found on surfaces or drains in the building, therefore it is not expected that contamination released from this building.
- 5 Section 4 of the Data Eval Form discusses the contamination that was found in this TU, despite the purported lack of contamination in Bldg 401. The narrative also states that there was no mention of pipe swipe surveys or sediment sampling in manholes, therefore the investigation did not follow the Work Plan and is deficient. This is important to note because contamination was found in this trench.
 - 6 Suspect worker involved in static/scan surveys

Recommend re-sampling.





| 2 | All surveys/sample collection results have low and/or non-detect results for Ac-228 | K-40 results have large range of values/variability, especially in FSS. | 4 |
|---|---|---|--------|
| 1 | All surveys/sample collection results have low and/or non-detect results for Ac-228 except for FSS-Bias results K-40: mean stays the same but spread up and down varies between events Cs-137: negative measurments appear to be remedied in 3/17 2008, 6 sampling events prior contain many negative activity levels | K-40 FSS has large range of values compared to other survey units. | 4 to 5 |



| On-site lab reported higher Bi-214 and Ra-226 values than off-site lab. | All surveys/sample collection results have low and/or non-detect results for Ac-228 | 1 | J Cunningham |
|--|---|---|--------------|
| On-site lab reported higher Bi-214 and Ra-226 values than off-site lab. | All surveys/sample collection results have low and/or non-detect results for Ac-228 | 0 | |

| | 1 | Static and scan data inconsistent. Static ranged from 4,452 - 4,914; scan data ranged from 3,000 - 7,000 cpm. Range for static data is too small indicating static data is falsified. All surveys/sample collection results have unusually low and/or non-detect results for Ac-228. This indicates either poor data quality or falsification. Suspect worker involved with data collection. | 1 |
|---------|---|---|---|
| S Brown | 1 | 1 -Static and scan data inconsistent. Static ranged from 3,953 - 4,543; scan data ranged from 3,000 - 7,000 cpm. Range for static data is small. 2 - Scan data is reported to be exactly the same as TU076 (3,000 - 7,000 cpm) 3 - Unclear whether Scan/Static personnel S. Brown is the same as Emitt Brown from NRC list 4 - K-40: mean stays the same but spread up and down varies between events Cs-137: negative measurments appear to be remedied in 3/17 2008, 6 sampling events prior contain many negative activity levels | 0 |

| Range of cpm values for static data is too small indicating static data may | | | | |
|---|---|--|--|--|
| have been collected at only one or a few locations. | | | | |
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- 1 Sanitary sewer is associated with Bldg 411. Data Eval Form does not state what activities occurred in these buildings.
- 2 Adjacent TUs 078, 080 also had several Ac-228 results that were at or below 0. In addition TU077 had the same Ac-228 low or at 0 results.
- 3 Static and scan data are inconsistent; static results ranged from 3,954 4,543 cpm and scan data ranged from 3,000 7,000 cpm. Inconsistency, and reporting of exact same cpm range for scan data in TU 076 and TU078 is flag for falsification.
 - 4 Suspect worker involved in data collection.
 - 5 Probable data quality issues with low Ac-228 results.

Data Eval Form states TU076 is adjacent to Bldg 411. Similarly, TU078 and TU080 are also adjacent to Bldg. 411. Samples collected from all three TUs include several Ac-228 results that are at or below 0, and similarities were observed with samples collected from TU077 which is adjacent to TU076.

Recommend re-sample.

- 1 Sanitary sewer is associated with Bldg 411 and 439. Data Eval Form does not state what activities occurred in these buildings.
 - 2 Adjacent TUs 076, 080 also had several Ac-228 results that were at or below 0. In addition TU077 had the same Ac-228 low or at 0 results.
- 3 Static and scan data are inconsistent; static results ranged from 3,954 4,543 cpm and scan data ranged from 3,000 7,000 cpm. Inconsistency, and reporting of exact same cpm range for scan data in TU 076 and TU078 is flag for falsification.
 - 4 It is unclear whether suspect worker was involved in data collection.

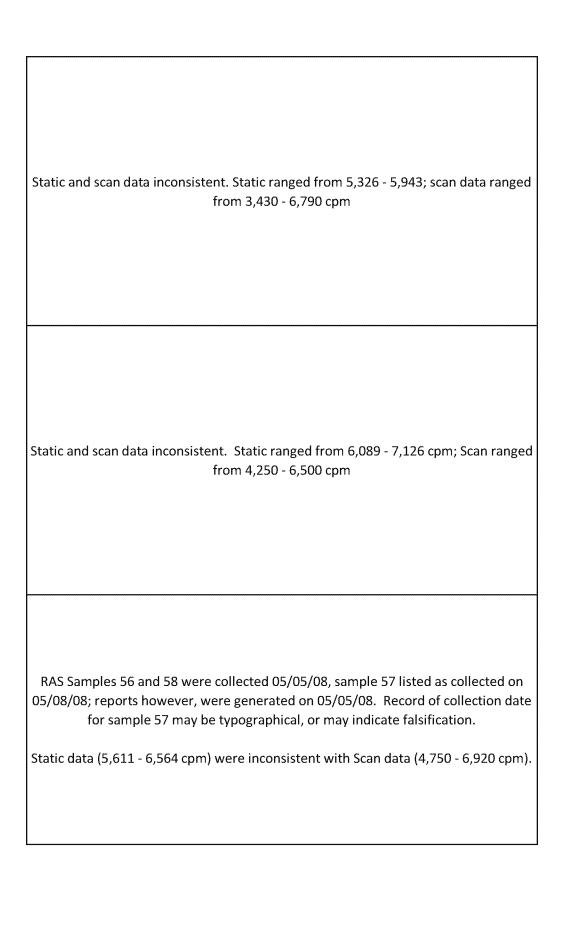
Data Eval Form states TU076 is adjacent to Bldg 411. Similarly, TU078 and TU080 are also adjacent to Bldg. 411. Samples collected from all three TUs include several Ac-228 results that are at or below 0, and similarities were observed with samples collected from TU077 which is adjacent to TU076.

Recommend re-sample.

| Need to look at data more closely to identify possible reasons for low or non-detect Sc-228 and data inconsistencies. For example: Were scan and static data sets approved/signed by RSO? Are COCs present in SUPR? Were any data quality issues mentioned in RACR or SUPR? |
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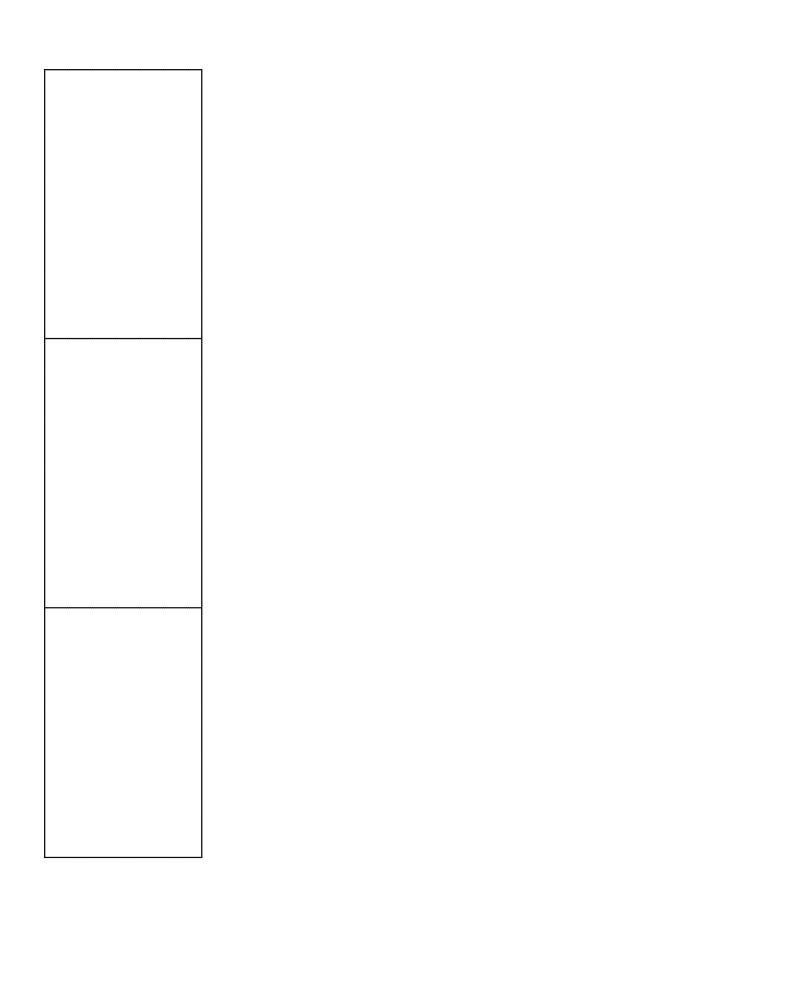
| TU079 |
|-------|
| TU080 |
| TU082 |

| 1 | Only FSS data collected, no remediation conducted. Large range of values/variability for all rads in FSS data | Only FSS data collected, no remediation conducted. Large range of values/variability for all rads in FSS data | 0 |
|---|--|--|---|
| 2 | Only FSS data collected, no remediation conducted. Large range of values/variability for all rads in FSS data | Only FSS data collected, no remediation conducted. Large range of values/variability for all rads in FSS data | 0 |
| 2 | All survey types had very low concentrations of Ac- 228, or concentrations at 0; RAS results for Ac-228 also had negative values FSS-BIAS spread different for K-40 then other events however mean is similar. Cs-137 affected by negative values. | No anomalies in trends observed; howevere Ac-228 results were low, with some reported as 0 or negative (RAS). | 2 |



| According to Data Eval Plan, the onsite vs off-site data are consistent | Variable data, large range of values | 0 | |
|---|--|---|--------------|
| On-site lab reported higher Bi-214 and Ra-226 values than off-site lab. | Variable data, large range of values | 1 | R Zahensky |
| Data Eval Form states data were consistent | No anomalies in trends observed; howevere Ac-228 results were low, with some reported as 0 or negative (RAS). | 1 | J Cunningham |

| P Vigil | 1 | Static data (5,326 - 5,943 cpm) and Scan data (3,430 - 6,790 cpm) are not consistent, static data has very narrow range of values compared to what would be expected for environmental conditions. | |
|---------|---|---|---|
| | 1 | Static and scan data inconsistent. Static ranged from 6,089 - 7,126 cpm; Scan ranged from 4,250 - 6,500 cpm | 0 |
| | 1 | 1 - RAS Samples 56 and 58 were collected 05/05/08, sample 57 listed as collected on 05/08/08; reports however, were generated on 05/05/08. Record of collection date for sample 57 may be typographical, or may indicate falsification. 2 -Static data (5,611 - 6,564 cpm) were inconsistent with Scan data (4,750 - 6,920 cpm). | 0 |



- 1 Sanitary sewer is associated with Bldg 411 and 439. Data Eval Form does not state what activities occurred in these buildings. HRA info is needed to evaluate potential for contamination of sewer lines/TU079.
- 2 Adjacent TUs 076, 078, and TU108; and nearby TUs 077, 080, 082 also had several Ac-228 results that were at or below 0.
- 3 Static and scan data are inconsistent; static results ranged from 5,326 5,943 cpm and scan data ranged from 3,430 6,790 cpm.
 - 4 Suspect worker involved in data collection.
 - 5 Probable data quality issues with Ac-228 results.

6 - 1 sampling event

- 1 Sanitary sewer is associated with Bldg 411. Data Eval Form does not state what activities occurred in these buildings. HRA info is needed to evaluate potential for contamination of sewer lines/TU079.
- 2 Adjacent TUs 076, and TU087 (also adjacent to Bldg. 411); and nearby TUs 077, 080, 082 also had several Ac-228 results that were at or below 0.
- 3 Static and scan data are inconsistent; static results ranged from 6,089 7,126 cpm and scan data ranged from 4,250 6,500 cpm.
 - 4 Suspect worker involved in data collection.
 - 5 Probable data quality issues with Ac-228

6 - 1 sampling event

- 1 RAS Samples 56 and 58 were collected 05/05/08, sample 57 listed as collected on 05/08/08; reports however, were generated on 05/05/08. Record of collection date for sample 57 may be typographical, or may indicate falsification.
 - 2 -Static data (5,611 6,564 cpm) were inconsistent with Scan data (4,750 6,920 cpm).
 - 3 Suspect worker involved with data collection.
- 4 TU082 is adjacent to TUs 077, 080, 081 which all included several Ac-228 results at or below 0. Data Eval Form incidates Bi-212 and Pb-212 in the Th-232 decay series were consistent with other sample results in TU082. This may indicate a data quality issue with the analysis and reporting of Ac-228.

Recommend for re-sampling

| Sanitary sewer is associated with Bldg 411 and 439. Data Eval Form does not state what activities occurred in these buildings. HRA info is needed to evaluate potential for contamination of sewer lines/TU079. |
|--|
| Sanitary sewer is associated with Bldg 411. Data Eval Form does not state what activities occurred in this building. HRA info is needed to evaluate potential for contamination of sewer lines/TU080. |
| |

| TU083 |
|-------|
| TU085 |
| TU087 |
| TU088 |
| TU089 |

| 2 | All surveys resulted in low and/or negative values for Ac-228. Narrow range and low values noted for Bi-214 in the FSS-SYS (conc ranges from approximately 0.3 - 0.45 pCi/g). The box plots do not provide the uncertainty values associated with any of the results so it is not clear how accurate these results are at such low concentrations. K-40 results were fairly consistent between survey types, but all surveys had highly variable (large range of vlaues between approximately 1 or 2 pCi/g - 30 pCi/g) in all surveys. | All three surveys for K-40 had similar distributions, with a large range of values | 2 |
|---|--|---|------------------------------|
| 2 | Box Plots show concern, K-40,B-214 FSS are from different populations. Box plot Ac-228. RAS appeared to show greater variability and activity than the other sets. The biased samples appear to represent a less diverse and lower activity population compared to the others. The biased samples should have been collected at the hot spots. Bi-214 shows similar. Same for K-40. Ac-228, Bi-214 | Q-Q plots - slope breaks show sometimes flatter, sometimes steeper, could mean different populations | 8 with 10 rounds of sampling |
| 2 | Only one set of SYS samples collected. No bias samples. Unusually small variability for Bi-214 is suspicious. | Slope break on all 3 - indicates two populations. | 1 |
| 2 | SYS-1 has more variability than any of the other data sets. FSS-Bias slightly less variable than FSS-SYS. FSS-SYS has less variability and a lower mean than the other data sets. | Slope break on all 3 - indicates two populations. | 4 |
| 1 | Only one set of SYS samples collected. No bias samples because no gamma scan exceedences. | Slope break on all 3 - indicates two populations. | 1 |

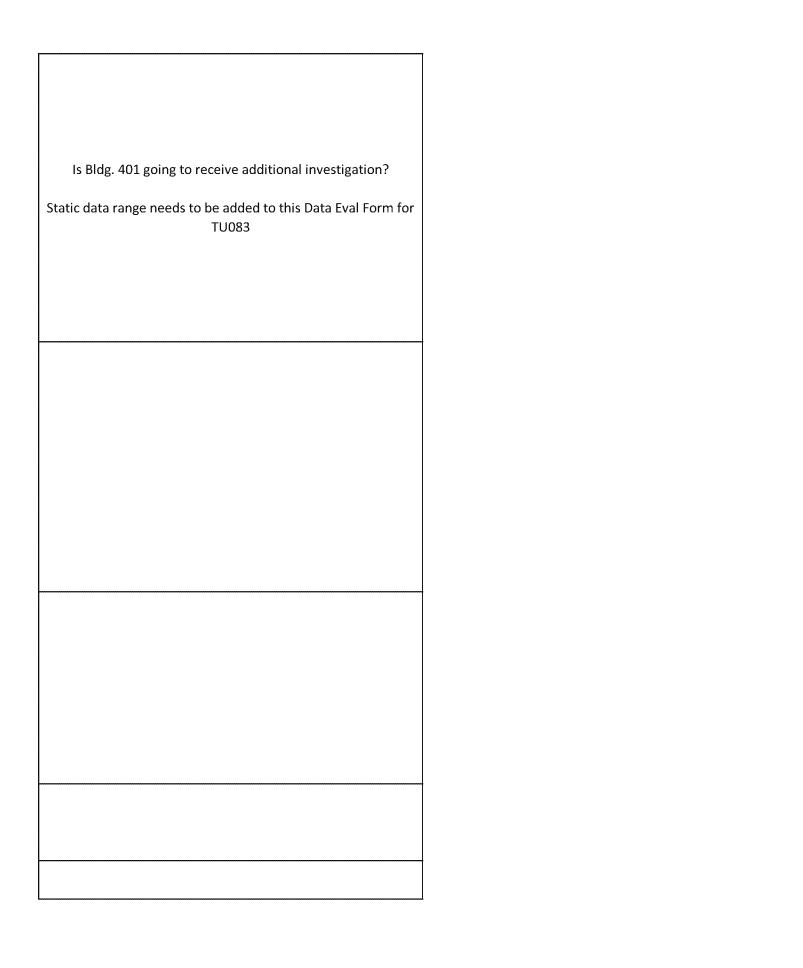
| The FSS results den | nonstrate high variability in K-40 results but low variability in Ac- 228 and Bi-214. |
|---------------------|--|
| | Pb-214 noted to have two populations |
| Data Eval Form st | tates Static and Scan data (2,000 - 5,000 cpm) are inconsistent. Static data range not provided. |
| Data Eval Form stat | tes Static data are potentially falsified but no evidence regarding sampling falsification is available. |
| S | Static scan date and time not provided in SUPR |
| Scan | ning was performed after FSS samples collected. |
| • | Navy indicates scans and statics are consistent |
| | na and statics noted to be consistent, but no elevated spots found nclear if this means that highs could have been deleted. No bias samples collected. |
| None | noted. Gamma and statics noted to be consistent. |
| | |

| On-site lab reported higher values than off-site lab, including one result for K-40 | Large range of values are reported for all survey types for K-40, which appears to indicate more than one population of soil type may be represented in the data. | 0 | |
|---|---|---|------------|
| 3 samples have values that differ by more than 10x: Form states, "For sample 70-PDT-085-30 values differing by more than 10X: Am-241 (0.05 pCi/g vs -0.47951 pCi/g), Cs-137 (-0.031 vs 0.057843 pCi/g), Eu-154 (-0.04 vs -0.00499 pCi/g), For sample 70 PDT 085-31 values differing by more than 10X: Am-241 (0.002 vs 0.024914), Cs 137 (-0.002 vs 0.076543). For sample 70-PDT-085-33 values differing by more than 10X: Eu-154 (0.004 vs 0.084744 pCi/g)." | Form notes, "Some Characterization samples display different characteristics from other bias, characterization, and final systematic samples." | 0 | |
| Two samples vary by more than 10x: Form states, "For sample 70-PDT-087- 10 values differing by more than 10X: Tl-208 (0.022043 vs 0.344), U-235 (- 0.99377 vs 0.08). For sample 70-PDT- 087-11 values differing by more than 10X: Am-241 (0.03806 vs 0.001), Cs- 137 (0.049789 vs -0.0006), Eu-154 (0.11423 vs 0), and Pa 234m (0.16956 vs -0.007)." | 1 Ac-228 result below 0 | 1 | R Roberson |
| | 1 Ac-228 result below 0 | 1 | A Jahr |
| | 2 Ac-228 results below 0 | 0 | |

| | , | | |
|----------|---|--|---|
| M Snyder | 1 | The FSS results demonstrate high variability in K-40 results but low variability in Ac-228 and Bi-214. Pb-214 (daughter of Ra-226) noted to have two populations Data Eval Form states Static and Scan data (2,000 - 5,000 cpm) are inconsistent. Static data range not provided. Data Eval Form states Static data are potentially falsified but no evidence regarding sampling falsification is available. Static scan date and time not provided in SUPR Scanning was performed after FSS samples collected. | |
| P DeLong | 1 | Mean and variability of bias samples less than FSS_SYS and characterization samples. Appear to represent a different population. Multiple rounds of excavation. On- and off-site samples differ by more than 10x. | 0 |
| | 1 | 10x difference between on- and off-site lab in 2 samples. Unusually small variability in Bi-214 data set. | 1 |
| | 0 | | 0 |
| P Vigil | 0 | | 1 |

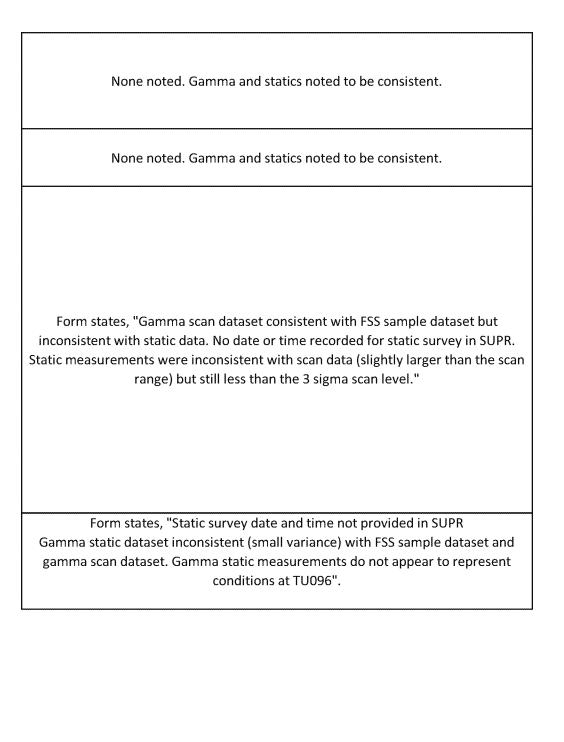
| No bias samples collected. Gamma scan conducted after FSS |
|---|
| No bias samples collected. Gamma scan conducted after FSS |
| No bias samples collected. Gamma scan conducted after FSS |
| No bias samples collected. Gamma scan conducted after FSS |
| No bias samples collected. Gamma scan conducted after FSS |
| No bias samples collected. Gamma scan conducted after FSS |
| No bias samples collected. Gamma scan conducted after FSS |
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| |
| Lagranda a company collection. |
| samples were collected. |
| |
| |
| |
| |
| |
| No bias samples |
| collected. |
| |
| |

| 1 - Sanitary sewer is associated with Bldg 401. Data Eval Form states that Bldg 401 was not identified in the HRA but that after it was leased, sealed radiological sourcs (dials and gauges) were stored in the building. Data Eval Form also states no contamination was identified on surfaces or drains, therefore there is no reasonable potenetial that Bldg 401 activities contaminaed the sewer system. Note: Based on revelations about building scan falsification issues, the reviewer questions how thorough or accurate surveys done on surfaces or drains in this building were. |
|--|
| 2 - Adjacent TUs include 076, 123, and 124. |
| 3 - Static and scan data are inconsistent; static results were not provided but scan data ranged from 2,000 - 5,000 cpm. Even number cpm values is suspect. |
| 4 - Scan data collected after FSS. This is suspect for falsification of Scan and Static measurement data. |
| Recommend re-sample. |
| Recommend resampling to confirm ROC concentrations for several reasons - inconsistent off-site lab results, mean and variability of bias samples inconsistent with FSS_SYS samples that appear to be a different population, evidence for multiple populations on Q-Q plots, 8 rounds of excavation. |
| This could be a data set where the scans were manipulated to remove highs, and then the FSS samples were biased to areas with low gamma scan result, but the form indicates that the gamma scan was performed after the FSS samples were collected. 7 manholes removed from this TU. Elevated gamma survey results were identified for Manholes MH340 and MH342, which were disposed as LLRW. Falsification identified in adjacent TU0086. Concern only moderate - could be real data. |
| Lower variability in FSS-SYS and FSS-Bias may indicate successful remediation or could indicate potential falsification (narrow range unusual). Low-to moderate concern. May be candidate for Tier 2 resampling. K-40: 1 event (3/4/08 RAS) has less variability than other 8 events. |
| 1 event. Otherwise no concerns |
| |



| TU092 TU093 | | |
|--------------|-------|--|
| TU093 | TU091 | |
| | TU092 | |
| TU096 | TU093 | |
| | TU096 | |

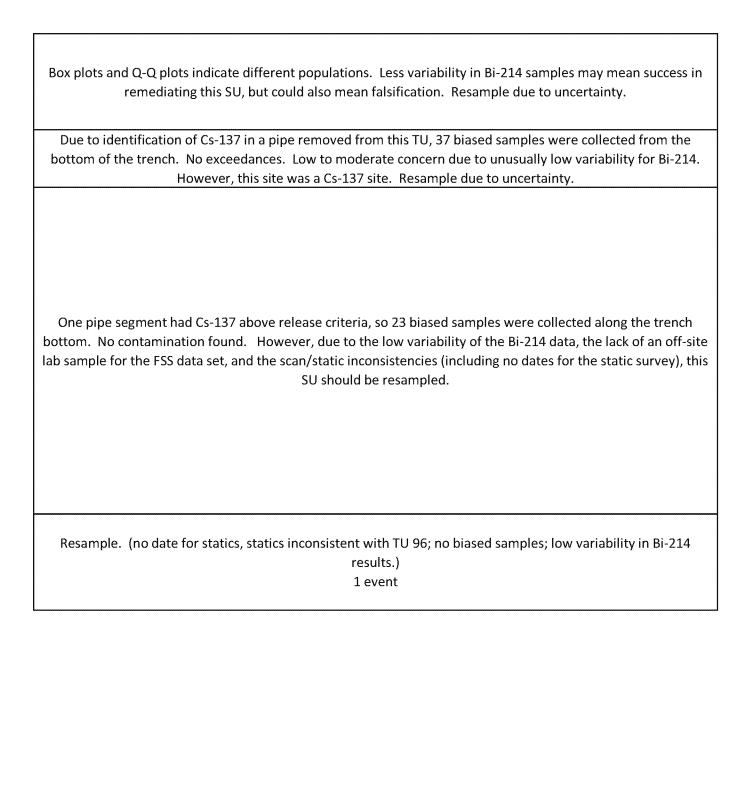
| 2 | K-40 and Ac-228 FSS_Bias appear to be different population - lower mean, less variability for Ac-228, less variability for Ac-228. For Bi-214, FSS-SYS and FSS_Bias are about the same and less variable than FSS_1. | Appear to be slope breaks on Ac-228 and Bi-214 plots | 3 |
|---|--|--|---|
| 2 | Bi-214 appears to have unusually low variability. | | |
| 2 | Ac-228 and Bi-214 FSS_SYS and FSS_Bias have less variability than the SYS_1 samples Negative Cesium values beginning in 5/30/2008 | Bi-214 has unusually small range for FSS samples compared to characterization samples. | 3 |
| 2 | Only one data set - FSS_SYS. Bi-214 samples have low variability and all results within a low range. No bias samples collected. | Appear to be slope breaks on Ac-228 and K-40 plots, probably 2 populations. | 1 |

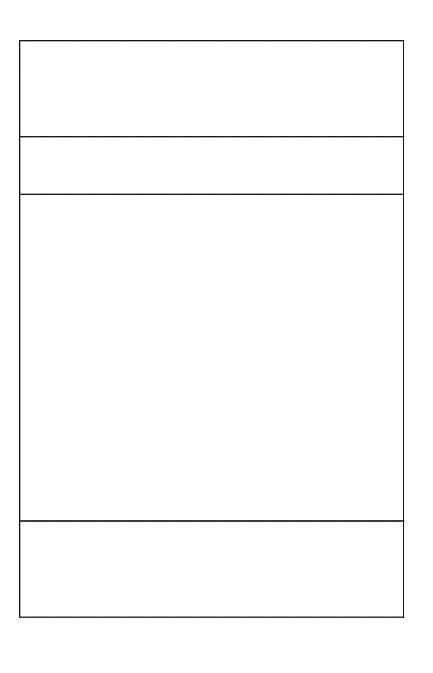


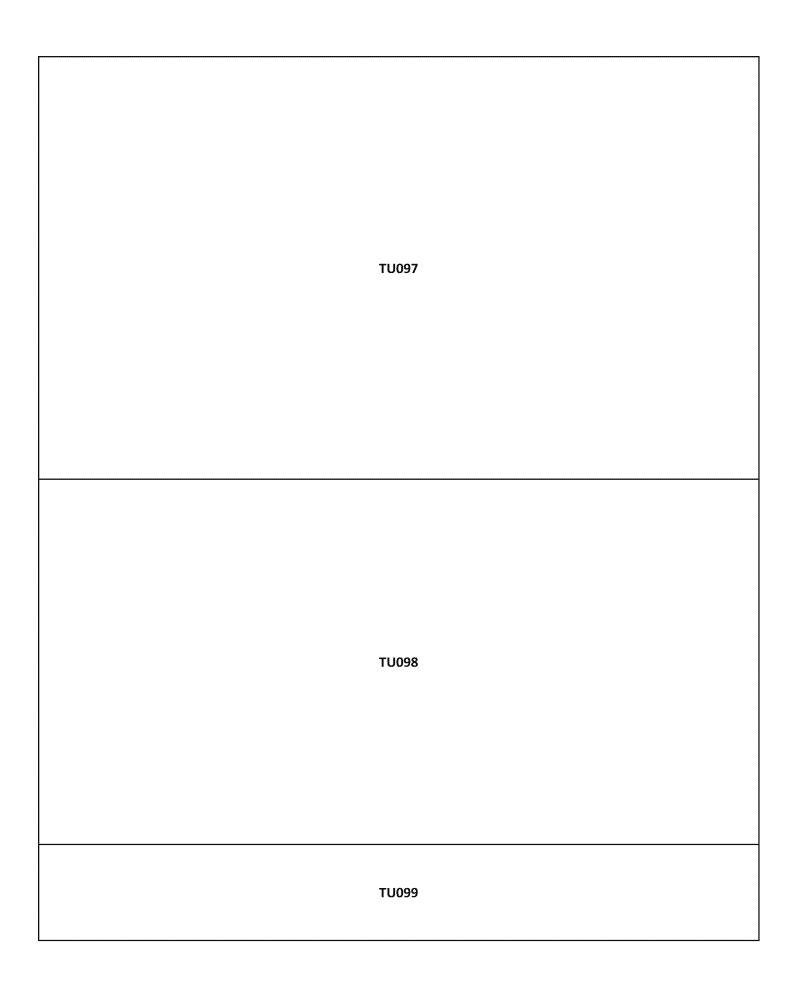
| | | 1 | J Cunningham |
|---|--------------------------|---|--------------|
| | 2 Ac-228 results below 0 | 0 | |
| Form states, "The on-site and off-site laboratories reported Ra-226 activity above the MDA/MDL for both samples. As a result, the Ra-226 activities for two samples were compared directly for precision. The results of the comparison showed relative percent differences (RPDs) from 95.12 to [and] 117.38. Because the on-site laboratory reported higher Ra-226 activity than the off-site laboratory and the RPDs were not within 30, as stated in the Sampling and Analysis Plan." None of the FSS samples were sent to the off-site lab, which should have been done. | 1 Ac-228 result below 0 | 0 | |
| consistent | 2 Ac-228 results below 0 | 1 | J Cunningham |

| | 0 | | 0 |
|-------------|---|--|---|
| | | | |
| M Snyder | 0 | | 0 |
| J Gutierrez | 0 | | 1 |
| | 1 | Statics inconsistent with FSS and gamma scan data set. Low variability in Bi-214 results. No Biased samples. | 1 |

| No date for Statics. |
|---|
| |
| No bias samples collected. No date for statics. |
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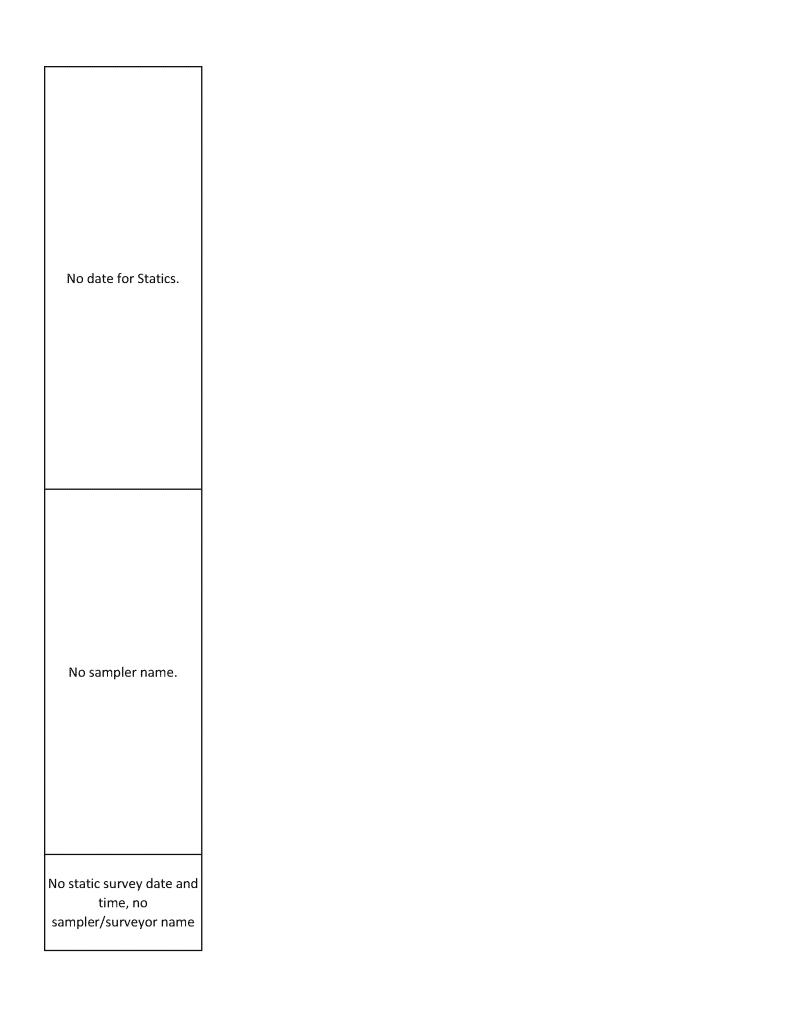


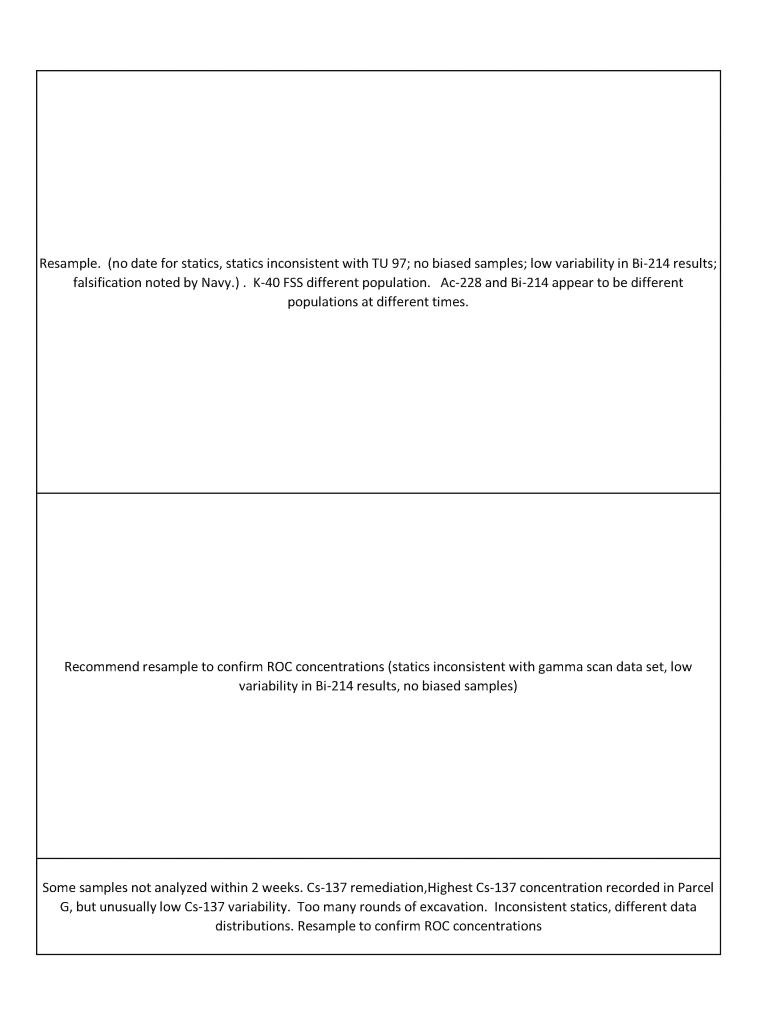
| 2 | FSS_SYS has low variability for Ac-228 and Bi-214 compared to characterization and FSS_1. However, K- 40 shows the opposite (more variability). FSS_SYS samples appear to be a different population. | Bias sample plots for Ac-228, Bi-214, and K-40 have slope breaks, indicating multiple populations. Form notes, "Samples 9 to 79 show low concentrations of Bi-214 and Ac-228. Samples 9 to 40 were collected on 08/19/2008. Samples 41 to 79 were collected on 08/20/2008. These samples were counted on 08/21/2008, 08/22/2008, and 08/25/2008. These samples were not biased to a specific location, but were distributed along the bottom of the trench to investigate potential leaks from the pipes. These samples do not appear to be representative of conditions at TU097. The small volumes of soil removed to remediate areas of elevated activity would not result in changes to the | 7 |
|---|---|---|----|
| | | entire distribution." KB notes one | |
| | | inconsistent reference to TU 096. | |
| 2 | K-40 - mean for Final is highest and less variable. Seems odd that FSS would have a different mean from the others. Ac-228 and Bi-214 have similar means, but less variability. for FSS_SYS. No FSS Bias samples collected. Negative CS-137 values; Ac-228 and Bi-214 mean is higher and more variable for 1/13/09 event as compared to others appears to be a different population. | Slope break on all 3 - indicates two populations. | 6 |
| 2 | Cs-137 samples show unusually low variability. K-40 outliers. No FSS_Bias samples | K-40 plots have slope breaks, as do characterization samples for Ac-228 and Bi-214, suggests multiple populations | 15 |
| L | | I | |

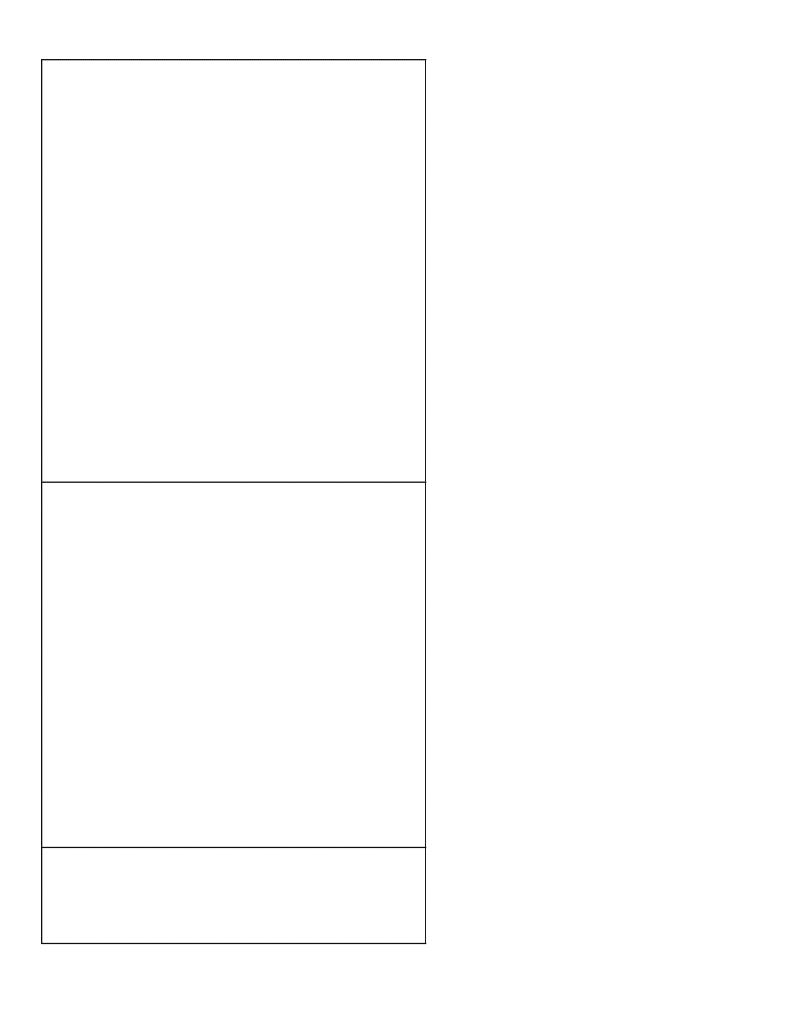
Form notes: "Static survey date and time not provided in SUPR. Gamma static dataset inconsistent (low variability) with FSS and gamma scan dataset. Gamma static measurements do not appear to represent conditions at TU096. Gamma scan results consistent with FSS dataset and inconsistent with gamma static dataset." and "No measurements above the investigation level were identified during the performance of gamma scans in Trench Unit 97. Seventy-nine investigative samples were collected along the trench bottom at 3-foot intervals because pipe sediment samples identified cesium-137 (Cs-137) activity at 0.17977 to 0.26670 pico Curie per gram (pCi/g) and radium-226 (Ra-226) activity at 1.8063 to 3.4019 pCi/g. Six of the investigative sample results identified Ra-226 activity to be present at 1.8799 to 2.4089 pCi/g." Form states, "Reported gamma static counts are suspect; ranged within an unusually narrow band between 4,211 and 4,632 gcpm. No reviewer or review date reported. Gamma static counts are not consistent with the reported gamma scan range and FSS dataset. " Also, "Scan range reported as 2,900 to 9,400 gcpm, apparently exceeding the investigation level of 7,048 gcpm without further explanation. This gamma scan range is not consistent with the gamma static counts, but could be consistent with the FSS dataset. " Form notes: "Static survey date and time not provided in SUPR. Static results reported low variability, inconsistent with gamma scan results and Final Systematic dataset."

| 7 samples noted to be consistent. | Form notes, "Initial Bias and other bias results display different characteristics from other Bias, Characterization and FSS samples." and for K-40, " Notes: FSS sample 129 had a high result different from other samples." For Ac-228, there were several biased sample results at or below 0. | 1 | J Cunningham |
|---|--|---|--------------|
| | Form states about first samples, " The Visual Sample Plan (VSP) was used to generate 18 systematic sample locations (samples 1 to 18) based on a random start point and a triangular grid. Four of the sample results identified radium-226 (Ra-226) activity to be present at 1.7536 to 2.7581 picocuries per gram (pCi/g). Based on this information, 29 additional samples were collected to further characterize the trench. Characterization sampling identified five additional locations where Ra-226 activity was identified to be present above the release criteria, at 1.5349 to 3.7863 pCi/g. " | 0 | |
| Form notes only 2 samples, inconclusive | Forms note for Bi-214 and Ac-228: "Third set of characterization data shows a different distribution from other data." | 1 | D DeLong |

| | 1 | Form notes, "Based on the findings of this evaluation, evidence of potential data falsification was found. It is unlikely the Biased Samples 9 to 79 represent actual conditions within TU097." KB notes that the inconsistent static survey data also indicates probable falsification. | 1 |
|----------|---|---|---|
| C Hughes | 1 | Statics inconsistent with FSS and gamma scan data set. Low variability in Bi-214 results. No Biased samples. | 1 |
| | 1 | Inconsistent statics, no final bias samples, third set of characterization data has different distribution. 22 sampling events - Results for Ac-228, B-212, and Bi-214 have different variability for the Sys_1 2/2/09 sampling event. Similar to S0119. Cs-137 different for the 11/13/08, 5/13/09, 6/12/09 and 6/18/09 events. | 1 |







| TU100 | |
|-------|--|
| TU101 | |
| TU102 | |
| TU102 | |
| TU103 | |
| TU104 | |

| 2 | Only one data set - FSS_SYS. Bi-214 samples have low variability and all results within a low range. No bias samples collected. | All 3 plots have slope breaks, suggest more than one population in FSS_SYS. | 1 |
|---|---|---|---|
| 2 | Ac-228 and K-40 FSS_SYS have greater variability than SYS_1 or characterizations sets. Bi-214 characterization samples appear to be different population (lower variability, smaller data range). No FSS_Bias samples. Form notes: "Sample distribution of Final Systematic samples is slightly more variable compared with other sample types of Bias and Characterization. One outlier was identified for Bi-214 and Ac-228." | Ac-228, Bi-214, K-40 FSS_SYS have slope break, indicating 2 populations. Unusually low range of results, variability for Cs-137 samples. | 2 |
| 2 | Ac-228, Bi-214, K-40 FSS_SYS have greater variability than other two data sets, while characterization samples have less varability. Cs-137 characterization data has the most variability. No FSS_Bias. Form notes: "Final Systematic sample distribution more variables compared to Bias and Characterization samples for Ac-228, Bi-214, and K-40." | Ac-228, Bi-214, K-40 FSS_SYS have slope breaks, indicating 2 populations. Unusually low range of results, variability for Cs-137 samples. Form notes: "The graph is more vertical than expected for the Final Systematic Ac-228 samples." | 2 |
| 2 | Ac-228, Bi-214, K-40 FSS_SYS have greater variability than other two data sets, while characterization samples have less varability. Cs-137 characterization data has the most variability. No FSS_Bias. Form notes: "Final Systematic sample distribution more variables compared to Bias and Characterization samples for Ac-228, Bi-214, and K-40." | Ac-228, Bi-214, K-40 FSS_SYS have slope breaks, indicating 2 populations. Unusually low range of results, variability for Cs-137 samples. Form notes: "The graph is more vertical than expected for the Final Systematic Ac-228 samples." | 2 |
| 1 | | | |
| 2 | | abnormally narrow range of measurement values. | |

Form notes: "No signature and date from site RSO was recorded on this survey. No gamma scan data was available for review to compare with the FSS samples specific dataset static/scan results." Also no signature for static survey.

Form notes: "The scan survey was performed on 07/19/2008 Scan range for 2350-1 Instrument is 2,970 – 6,590 cpm, exceeding the 3-sigma investigation level for 2350-1 instrument (6,161 cpm). No signature and date from site RSO was recorded on this survey. No gamma scan data was available for review to compare with the Final Systematic samples specific dataset static/scan results." For statics, "The highest count was recorded at 5,842 cpm for sample location 029." Unclear, but bias samples should probably have been collected.

Form notes: "The scan survey was performed on 07/11/2008 Scan range for 2350-1 Instrument is 2,310 – 5,960 cpm. The 3 sigma investigation level for 2350-1 Instrument was 6,161 cpm. No signature and date from the site RSO was recorded on this survey. No gamma scan data was available for review to compare with the Final Systematic samples specific dataset static/scan results." FORM for TU101 notes about TU102: "The static data results for TU 102 is inconsistent compared with the adjacent trenches. The lowest static count was reported for TU102 at 2,471 cpm compared to 3,300 cpm for TU100 and 4,366 cpm for TU070. The highest static count was reported at 6,531 cpm for TU100 compared to 5,377 cpm for TU102."

Form notes: "The scan survey was performed on 07/11/2008 Scan range for 2350-1 Instrument is 2,310 – 5,960 cpm. The 3 sigma investigation level for 2350-1 Instrument was 6,161 cpm. No signature and date from the site RSO was recorded on this survey. No gamma scan data was available for review to compare with the Final Systematic samples specific dataset static/scan results." FORM for TU101 notes about TU102: "The static data results for TU 102 is inconsistent compared with the adjacent trenches. The lowest static count was reported for TU102 at 2,471 cpm compared to 3,300 cpm for TU100 and 4,366 cpm for TU070. The highest static count was reported at 6,531 cpm for TU100 compared to 5,377 cpm for TU102."

Scan data elevelated compared to sample data/several samples may have been substituted, Gamma Scan Survey performed on 05/28/2009 at 13:40 on the same day as Final

Systematic Sample collection.

Gamma scan dataset inconsistent with static data. Scan Data range 2,910-8,510 cpm, exceeding the investigation level of 7,048 cpm. Static data range 3,100-3,400 cpm.

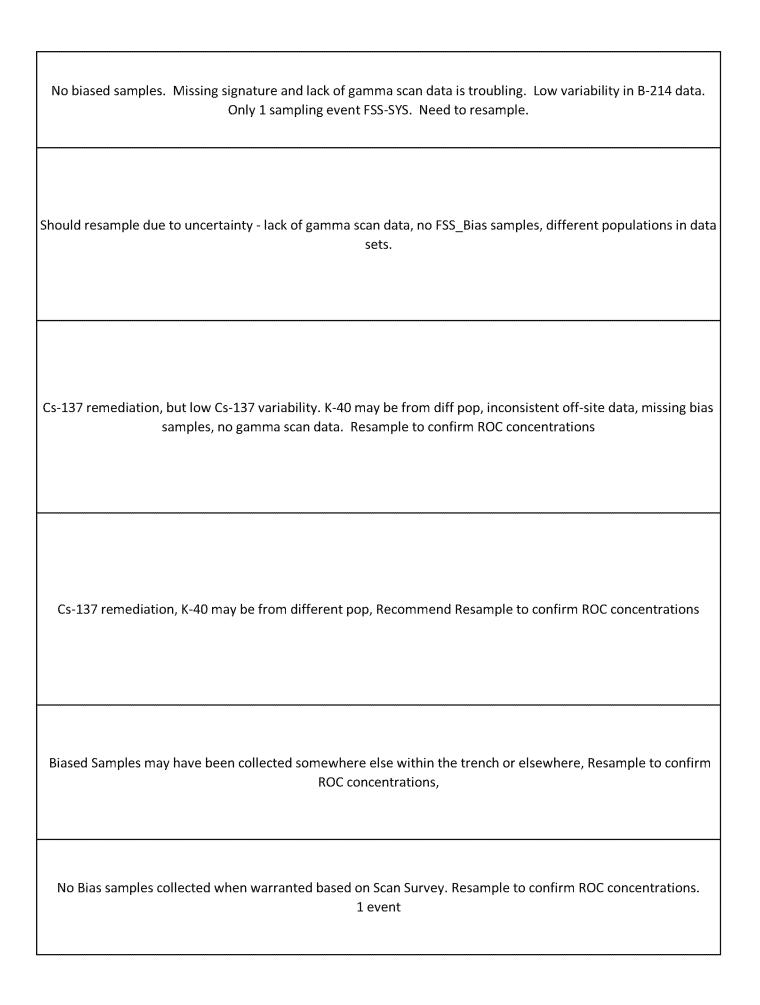
Gamma Scan Survey performed on 05/28/2009 at 13:40 on the same day as Final Systematic Sample collection.

Scan survey performed on 09/30/2008 at 07:40 prior to FSS sample collection. Gamma static dataset inconsistent with scan data and FSS sample dataset. Static range from 3,900-4,300 cpm with a STDEV of 136 cpm. Scan data has a range of 1,170-8,170 cpm exceeding the investigation level of 4,078 cpm.

| Form says consistent. | | 1 | R Zahensky |
|--|--|-------|------------|
| Form notes: "Data comparison is relatively close for Ac-228, Bi-214, and K-40." | Form notes: "The data range for K-40 from 4.68 through 14.96 pCi/g." | 1 | R Zahensky |
| Form notes: "Data comparison is relatively close for Ac-228, Bi-214, and K-40."Data inconsistent with Final Systematic sample (046) for the K-40 results. Onsite result was 20.29 pCi/g while the offsite result was 8.2 pCi/g." | Form notes: "The data range for K- 40 from 5.06 through 20.22 pCi/g." | TU102 | 1 |
| Form notes: "Data comparison is relatively close for Ac-228, Bi-214, and K-40."Data inconsistent with Final Systematic sample (046) for the K-40 results. Onsite result was 20.29 pCi/g while the offsite result was 8.2 pCi/g." | Form notes: "The data range for K-40 from 5.06 through 20.22 pCi/g." | 1 | R Zahensky |
| | | 0 | |
| | | 0 | |

| | | | 1 |
|------------|---|--|---|
| | 1 | No gamma scan data available. Should have been in SUPR. | 1 |
| R Zahensky | | Unusually low variability for Cs-137. Missing bias samples. Possibly inconsistent statics. Missing gamma scans. | 1 |
| | 1 | Unusually low variability for Cs-137. Missing bias samples. Possibly inconsistent statics. Missing gamma scans. | 1 |
| C Hughes | 1 | Sampler Namer Not provided in SUPR. 2) Biased samples have low activity concentration when compared with the FSS samples | |
| C Hughes | 1 | Sampler Namer Not provided in SUPR. 2) No Bias Samples collected when warranted by Scan measurements, samples may have been collected somewhere else within the trench | 1 |

No signature and date from site RSO for gamma scan and statics. No gamma scan data available in SUPR. No Site RSO signature, no FSS_Bias. Gamma scan data suggest statics should have been collected. No signature and date from site RSO for gamma scan and statics. No gamma scan data available in SUPR. No signature and date from site RSO for gamma scan and statics. No gamma scan data available in SUPR. yes, No BIAS Samples collected based on scan data



| See TU101 form, which notes "The static data results for TU 102 is inconsistent compared with the adjacent trenches. The lowest static count was reported for TU102 at 2,471 cpm compared to 3,300 cpm for TU100 and 4,366 cpm for TU070. The highest static count was reported at 6,531 cpm for TU100 compared to 5,377 cpm for TU102. " Is this relevant for TU101 or 102? |
|--|
| See TU101 form, which notes "The static data results for TU 102 is inconsistent compared with the adjacent trenches. The lowest static count was reported for TU102 at 2,471 cpm compared to 3,300 cpm for TU100 and 4,366 cpm for TU070. The highest static count was reported at 6,531 cpm for TU100 compared to 5,377 cpm for TU102. " Is this relevant for TU101 or 102? |
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| TU107 TU108 TU111 TU115 |
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| TU108 TU111 TU115 |
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| TU121 |

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| 2 | Cs-137 has more variability and different mean for the 5/30/08 event compared to the 5 events | | |
| 2 | | | |
| 2 | Bi-214 and Ac-228 indicate multiple populations by date | Different slope in line on final. One way falsification caught in 2012 was K-40 for FSSR not the same as original. Slope for Ac-228 looks like 2 different populations in biased samples. | |
| 2 | K-40, Ac-228, Bi-214 population on 4/15/09 appears different from the other 5 events | | |
| 2 | | | |
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| 2 | | | |

Static survey date and time not provided in SUPR. Gamma static dataset inconsistent (standard deviation of the static measurements is too small at 97 cpm) with scan data and Final Systematic sample dataset. Scan survey performed on 04/22/2009 at 08:00 prior to Final Systematic sample collection. Scan range exceeds the 3 sigma scan threshold. Scan data inconsistent with FSS sample dataset and static data.

Scan survey performed on 10/14/2008 at 08:15 prior to Final Systematic sample collection. Gamma scan contained measurements greater than the 3-sigma threshold. No date or time recorded for static survey in SUPR. Gamma static dataset consistent with scan data and Final Systematic sample dataset

Scan survey performed on 05/06/2009 at 13:50 after the commencement of Final Systematic sampling. Scan range is 2,390 – 7,900 cpm, exceeding the 3 sigma investigation level of 7,048 cpm.

Scan measurements above investigation threshold inconsisten w/ FSS samples, samples could have been taken in areas with lower count rate in trench. DK - 115 looks ok to me.?

Scan survey performed on 04/27/2009 at 08:45 prior to the commencement of Final Systematic sampling. Some scan measurements exceeded the scan threshold.

Scan survey was performed on 10/31/08 at 09:15 prior to FSS sample collection.

Gamma scan dataset not consistent with static dataset.

1) Static survey date and time not provided in SUPR.

Static results reported low variability inconsistent with gamma scan results and lab data. 2) Scan survey was performed on 10/31/08 at 09:15 prior to FSS sample collection.

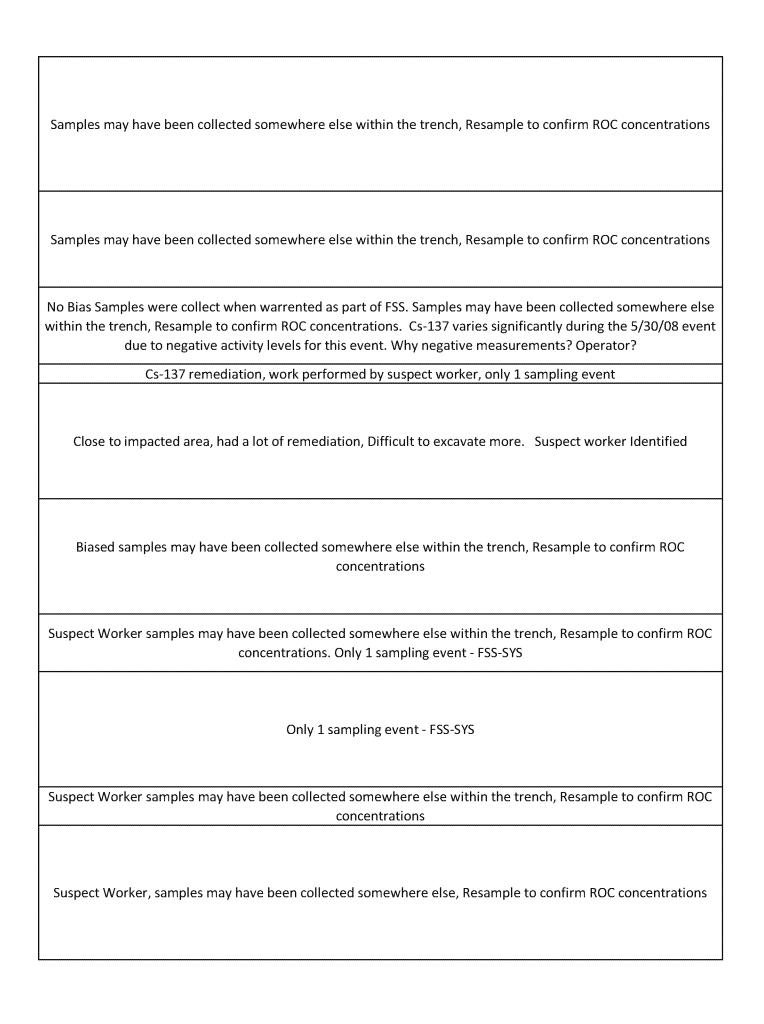
Gamma scan dataset not consistent with static dataset.

Gamma static counts ranged within a narrow band between 3,984 gcpm and 4,747 gcpm and are not consistent with the gamma scan range or FSS dataset. Performed by a suspect worker; no reviewer or review data reported. Performed on 01/24/2009 at 09:40h by a suspect worker. Scan range listed as 3,300 – 7,700 gcpm, apparently exceeding the IL of 7,048 gcpm without further explanation. This gamma scan range is not consistent with the range of gamma static counts described above, but is consistent with the FSS dataset.

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| | 0 | |
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| | 1 | J Cunningham |
| | 1 | B Evans |
| | 0 | |
| | 1 | J Cunningham |
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| | 1 | J Cunningham |

| C Hughes | 1 | 1) Static survey date and time not provided in SUPR. Gamma static dataset inconsistent (standard deviation of the static measurements is too small at 97 cpm) with scan data and Final Systematic sample dataset 2) Scan survey performed on 04/22/2009 at 08:00 prior to Final Systematic sample collection. Scan range exceeds the 3 sigma scan threshold. Scan data inconsistent with FSS sample dataset and static data. | 0 |
|----------|---|--|---|
| C Hughes | 1 | Scan range exceeds the 3 sigma scan threshold. Scan data inconsistent with FSS sample dataset and static data. | 0 |
| C Hughes | 1 | Scan survey performed on 05/06/2009 at 13:50 after the commencement of Final Systematic sampling. Scan range is 2,390 – 7,900 cpm, exceeding the 3 sigma investigation level of 7,048 cpm. No Bias Samples were collected | 1 |
| | 1 | K-40 Final sample set appears different from earlier. Ac-228 shows 2 different populations, scan measurements higher earlier inconsistent with final sample results | |
| C Hughes | 1 | Scan survey performed on 04/27/2009 at 08:45 prior to the commencement of Final Systematic sampling. Some scan measurements exceeded the scan threshold. K-40, Ac-228, Bi-214 population on 4/15/09 appears different from the other 5 events | 0 |
| | 1 | Scan survey was performed on 10/31/08 at 09:15 prior to FSS sample collection. Gamma scan dataset not consistent with static dataset. | |
| C Hughes | 0 | 1) Static survey date and time not provided in SUPR. Static results reported low variability inconsistent with gamma scan results and lab data. 2) Scan survey was performed on 10/31/08 at 09:15 prior to FSS sample collection. Gamma scan dataset not consistent with static dataset. | |
| | *************************************** | Bi-214 have different variability for the Sys_1 2/2/09 sampling event. | 1 |
| | 1 | Some of the samples collected appear to be from a different population | 1 |

| yes, No BIAS Samples collected based on scan | | |
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| data | | |
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| yes, No BIAS Samples collected based on scan | | |
| data for FSS | | |
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| Cs-137 varies significantly during the 5/30/08 event due to |
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| negative activity levels for this event. Why negative |
| measurements? Operator? |
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| 1 | Box Plots show concern | 1 |
| 2 | Box Plots indicate Narrow Range, but scan data indicates a larger range | |

Static survey date and time not provided in SUPR.

Gamma static dataset inconsistent with scan data and Final Systematic sample dataset

The static gamma measurements, which were collected before sampling, do not reflect the variability observed in either the range of the scan results or the analytical results. The scan range and sample activity range appear plausible. It should be noted that scan results above the investigation level were apparently never investigated or sampled.

Static range = 3,748 - 4,220 cpm

Scan range = 1,390-8,240 cpm (investigation level = 7,048 cpm) Sample activity range (K-40) = 3.5-13.5 pCi/g Scan range = 1,390-8,240 cpm (investigation level = 7,048 cpm) Scan survey performed on 07/06/2012 at 10:00 prior to Final Systematic sample collection.

Gamma scan dataset inconsistent with static data and/or Final Systematic sample dataset.

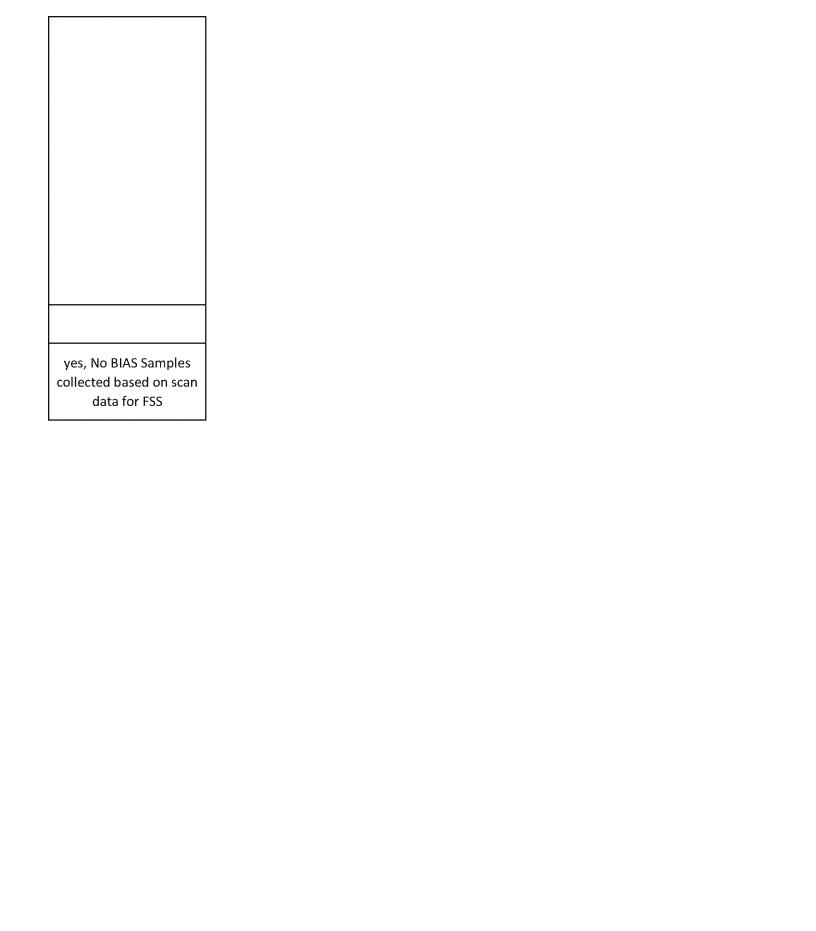
Performed by a suspect worker; no reviewer or review data reported.

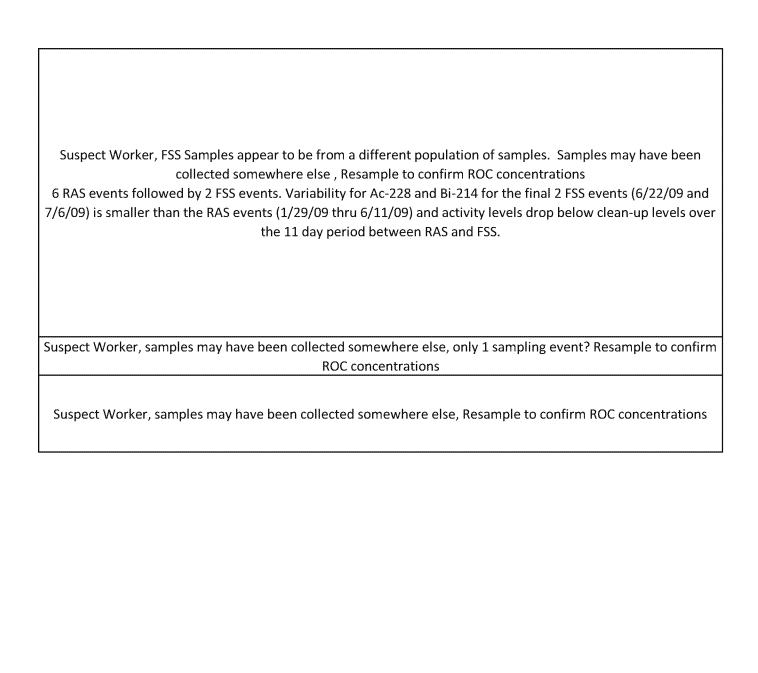
The scan survey was performed on 06/15/2011. Scan range for 2350-1 Instrument is 4,000 to 7,610 cpm. The 3 sigma investigation level for 2350-1 Instrument was 8,014 cpm. No signature and date from the site RSO was recorded on this survey.

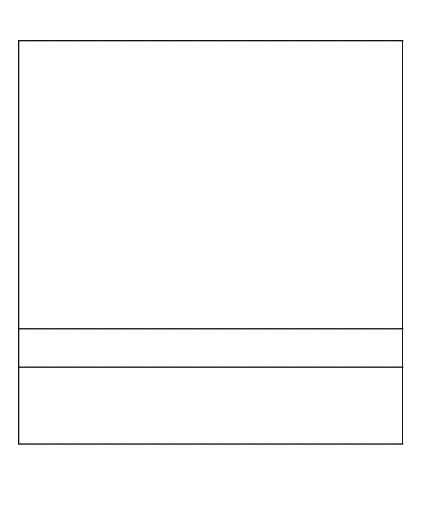
No raw scan data was provided in the SUPR.

| FSS samples appear to be from a different population | 1 | D DeLong |
|---|---|--------------|
| | 1 | J Cunningham |
| | 1 | J Cunningham |

| 1 | Gamma scan dataset inconsistent with static data and/or Final Systematic sample dataset. Samples may have been collected somewhere else within the trench. Resample to confirm ROC concentrations | |
|---|---|--|
| | | |
| | samples may have been collected somewhere else within the trench, Resample to confirm ROC concentrations | |







Summary of EPA review of Parcel G Trench

| Juninary of LFA review of Farcer a frenc | | | |
|--|-----------------------|--|--|
| | | | |
| Number of TU's | % of Parcel G total | | |
| 63 | 100% | | |
| Navy reviewed 63 tota | l Trench Units to loo | | |
| 20 | 32% | | |
| 0 | 0% | | |
| 43 | 68% | | |
| EPA reviewed the 43 Trench Units recomm | | | |
| 0 | 0% | | |
| 11 | 17% | | |
| 32 | 51% | | |
| Total Navy and EPA recommend for resam | | | |
| 52 | 83% | | |

| EPA score |
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1 Units Draft 10-13-2017

Total trench units in Parcel G

k for signs of potential falsification

Navy recommended confirmation sampling due to signs of potential falsification

Navy recommended reanalysis of archived samples

Navy recommended NFA = No further action due to signs of falsification, but potential further action due to uncertainty mended for NFA

EPA score 0 = No specific findings of particular concern

EPA Score 1 = Need further review

EPA Score 2 = Need resampling before determination that the record supports ROD requirements met

oling

83% of total TU's now recommended for resampling and 17% need further evaluation

Note: TU 66 and TU 70 the Navy recommended for partial re-sampling only. However, both are marked for full resampling due to suspect soil from the fill unit that was used to fill those TUs.

| TU098 | 2 |
|-------|---|
| TU099 | 2 |
| TU100 | 2 |
| TU101 | 2 |
| TU102 | 2 |
| TU102 | 2 |
| TU104 | 2 |
| TU108 | 2 |
| TU111 | 2 |
| TU115 | 2 |
| TU116 | 2 |
| TU117 | 2 |
| TU121 | 2 |
| TU124 | 2 |
| TU204 | 2 |

